

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

COMMONWEALTH EDISON COMPANY

Application for a Certificate of Public Convenience and Necessity, pursuant to Section 8-406.1 of the Illinois Public Utilities Act, and an Order pursuant to Section 8-503 of the Illinois Public Utilities Act, to Construct, Operate, and Maintain a new 345 kilovolt transmission line in Ogle, DeKalb, Kane and DuPage Counties, Illinois

Docket 13-0657

INITIAL BRIEF ON REOPENING

Jerry Drexler, Kristine Drexler, William Lenschow, Thomas Pienkowski, Kristin Pienkowski, Robert and Diane Mason, John Tomasiewicz, Ellen Roberts Vogel, and Utility Risk Management Corporation,

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Jerry Drexler, Kristine Drexler, William Lenschow, Thomas Pienkowski, Kristin Pienkowski, Robert and Diane Mason, John Tomasiewicz, Ellen Roberts Vogel (together, the “SKP Parties”), and Utility Risk Management Corporation (“URMC”), file their Initial Brief on Reopening in the above-referenced proceeding.

I. Introduction

The record in this proceeding was reopened following and based on Commonwealth Edison Company’s (“ComEd”) revelation, after the record had been closed and briefing had been completed, that prior to filing its Petition for approval of its Grand Prairie Gateway Project (“GPG Project”), Verified Petition (December 2, 2013), ComEd had collected data from county assessors’ offices in three separate counties prematurely.¹ ComEd disclosed this error to the parties and the Illinois Commerce Commission (“Commission”) on May 1, 2014, in its Supplement to Verified Petition of Commonwealth Edison Company. ComEd’s disclosure set off a series of responses and other filings, starting with the Commission Staff’s response on May 9 (“Staff Response”), in which the Staff, *inter alia*, requested that the record be re-opened. Staff of the Illinois Commerce

¹ In violation of Rule 150 (h) of the Commission’s Rules of Practice. 83 Ill. Admin. Code 200.150(h).

Commission Motion to Respond and Response to Supplement to Verified Petition of Commonwealth Edison Company (May 9, 2014). Among other filings was ComEd's Motion to submit additional testimony of Donell Murphy concerning the development of Exhibit D (list of impacted landowners) to ComEd's original Petition and resulting notice to landowners. Commonwealth Edison Company's Motion for Leave to Submit Testimony (May 19, 2014). ComEd also proposed, in its reply to the Staff Response, that the record be re-opened for the limited purposes of (a) gathering evidence of individual notice under Commission Rule of Practice Section 200.150; and (b) permitting the "Lange/Skaggs parties"² and any other person who has not already received notice and whose land is crossed by any route proposed by any party to testify on any issue. Commonwealth Edison Company's Reply to Staff's response to ComEd's Supplement to its Verified Petition, at 14 (May 19, 2014).

On May 28, 2014, the Administrative Law Judges ("ALJs") issued a ruling granting ComEd's request to re-open the record³ and setting a schedule for additional testimony, hearing and briefing, along with a new deadline for Commission action. Notice of Administrative Law Judges' Ruling (May 28, 2014). The next day, ComEd filed a motion to amend its Petition. Commonwealth Edison Company's Motion for Leave to File an Amendment to its Petition (May 29, 2014) ("Motion to Amend Petition"). The stated purposes were (a) to plead facts relevant to the notice issue; and (b) to plead that ComEd sent additional notice of this docket to an expansive list of landowners who, as of May 23, 2014, appeared in the assessors' office as owners of land that is (i) on or adjacent to ComEd's Primary or Alternate Routes and who did not appear on Exhibit D; (ii) on any route proposed by an intervenor; or (iii) adjacent to any route proposed by an intervenor. Motion to Amend Petition, ¶ 5, at 2. In response to ComEd's Motion to Amend Petition, the

² Impacted landowners Rachel Lange and Riley Skaggs

³ The May 28 ruling to re-open was expressly made subject to the reopening of the record by the Chief Administrative Law Judge.

Commission entered an order granting the motion but ruled that the Commission's acceptance of an amended petition "rectifying the prior notice issue triggers a new 150 day deadline." Order on Motion to File Amended Petition, at 2 (July 9, 2014). As a result, the Commission confirmed the schedule on reopening previously established by the ALJs with the exception that, based on resetting the 150-day statutory time period, the deadline for Commission action was set as October 27, 2014.

Following additional petitions to intervene and the submission of additional testimony by ComEd and various other parties, some of which testimonies are addressed herein below, a hearing on reopening was held at the Commission's offices on July 23, 2014, at the conclusion of which the record was marked heard and taken. Tr., 462.

II. The routing endorsed by the SKP Group remains the best routing after re-opening

In its Initial and Reply Briefs, the SKP Group demonstrated the patent superiority of proposed several route segments. It demonstrated that, based upon the twelve-factors considered by this Commission, the Kenyon-Deutsch combined alternative is a superior routing option in the area of the Kane-DeKalb County line. See, e.g., Table 1, SKP Parties & URM Initial Brief, p. 20. Dauphinais Adjustment 1 is also superior to ComEd's Proposed Primary Route. See, e.g., Table 2, SKP Parties & URM Initial Brief, p. 22. The SKP Group further demonstrated that Dauphinais Adjustment 2 is superior to the portion of ComEd's proposed primary route that it replaces. See, SKP Parties & URM Initial Brief, pp. 31-33. These adjustments are not the result of "Not In My Back Yard" arguments but, rather, result from the generation of superior routing alternatives developed by a transmission line routing expert and based upon utilization of the same data, same GIS files, same public input, and same routing factors and methodology utilized by ComEd.

While ComEd has continued to refuse to recognize the superiority of alternatives to its routing, nothing in the evidentiary record on rehearing has changed the fact that the SKP Group

proposed adjustments remain superior. In fact, if anything, the opportunity for additional public input since this docket was reopened and the lack of any evidence refuting the proposed adjustments further indicates the adjustments are superior.

A. ComEd's repeated assertions as to the lack of public input are unpersuasive

ComEd, prior to this record being reopened, was purportedly concerned with whether or not individuals in the area of proposed adjustments received notice of those proposals. ComEd Initial Brief, p. 26. On cross-examination at the hearing on reopening,⁴ ComEd's routing witness, Donell Murphy, repeatedly asserted that ComEd's "robust public process" made ComEd routes superior. See, e.g., Tr., 427:11-13. When explicitly asked which of the twelve factors considered by the Commission made ComEd's Proposed Primary Route superior, Ms. Murphy could only assert that the public process made it superior. Tr., 433:3-14, 434:19-7. Such a position is simply illogical and untenable.

1. *Accepting ComEd's position would effectively bar any landowner adjustments in any §8-406.1 proceedings*

Through its routing witness, ComEd has essentially taken the position that any landowner proposing adjustments must undertake their own "robust public process." Indeed, ComEd discounts routes that don't involve a "very robust public process." Tr., 427:11-13 (emphasis added). ComEd had the opportunity to undertake this robust process prior to filing its original Petition in order to meet its statutory duty.⁵ Tr., 428:1-4 (discussing a process that ran from February, 2013 to December, 2013). Unfortunately, when a utility chooses to bring a petition under §8-406.1 of the Public Utilities Act, it chooses to saddle the Commission Staff and other interested parties with a shortened period of time from the dates of notice of proceedings to other direct

⁴ Questioning based upon Ms. Murphy's repeated statements of ComEd routing superiority in submitted testimony on reopening. ComEd Ex. 32.0 REV, ll. 54-57; ComEd Exh. 34.0, ll. 34-36

⁵ The legislature has not extended a similar duty to the Commission Staff or intervenors.

testimony being filed. During this short period of time, it is simply impossible to engage in any additional “robust public process” steps similar to those undertaken prior to the utility’s filing of its petition. Accordingly, as a matter of policy, such a position is untenable.

It is manifest that other parties, who weren’t even notified of proceedings until approximately one month after the proceedings had begun, could not have undertaken a “very robust public process.” It is unlikely that any landowner intervenor could ever undertake such a process – which took ComEd thousands of person hours – even with an extended 225 day time period. Accordingly, accepting ComEd’s arguments essentially stacks the deck in the utility’s favor. That is, even if a landowner generated categorically superior routing based upon the twelve factors utilized by the Commission, it still won’t satisfy ComEd’s interpretation of those factors. Not only is ComEd’s position untenable, but even ComEd doesn’t abide by it. In this regard, it is noteworthy that, despite its repeated advocacy about a “robust public process,” ComEd did not request the Commission to hold a public forum for the GPG Project, at which interested persons could appear and make statements about any aspect of the GPG Project. A public forum was held only upon the request of certain members of the SKP Parties, the City of Elgin, and the Village of South Elgin. Joint Motion for Public Forum (April 7, 2014). Sufficient interest was generated that the transcript of the public forum filled 115 pages, indicating that it was a “robust” public event. In The Matter Of: Public Forum to discuss ComEd’s Grand Prairie Gateway Project[] , Hearing before John Sagone, April 24, 2014.

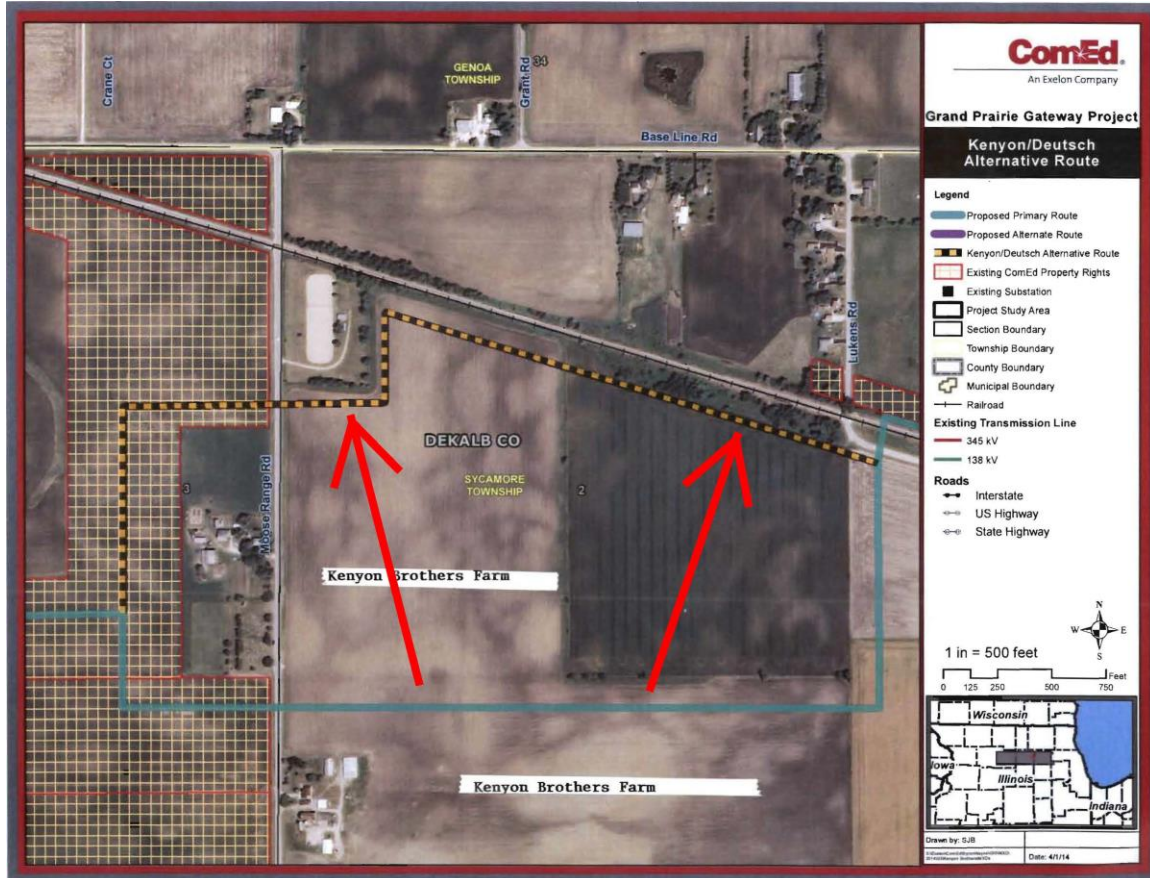
2. *ComEd's support for the Kenyon Bros. adjustment belies the credibility of its public process position*

Just like ComEd's refusal to seriously consider or study undergrounding the transmission line in densely populated areas despite public outcry in, and outside of, its formal public process,⁶ ComEd's support for the Kenyon Bros. proposed adjustment shows that its so-called "robust public process" included only some relevant factors, excluding others for which ComEd desired no scrutiny or feedback, even if it took thousands of person-hours. Kaup, Reb., ComEd Exh. 16.0, ll. 82-83; Kaup, Tr., 114:1 - 115:6 (indicating that no specific underground design was considered, that preliminary design estimates were only made upon receipt of data requests, and the efforts undertaken were inaccurate and preliminary); ComEd Ex. 32.0 REV, 54-57 (showing ComEd's support for the most-favored landowner's, the Kenyon Bros., proposed adjustment). The impact of the Kenyon Bros. adjustment is not limited solely to that landowner, as it moves ComEd's proposed routing from a field far away from any neighbors to property lines significantly closer to neighboring landowners.

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⁶ Including suggestions in this docket from intervenors Mason, City of Elgin, County of Kane, Board of Education of School District U-46, the Forest Preserve District of Kane County, Tomasiewicz, and Payne. Further, references to undergrounding the transmission line in the public comments section of this docket are legion.

Illustration 1 – Kenyon Bros. Routing Affecting New Landowners



Kenyon Bros., Rebuttal Testimony, p. 2 (red arrows added).

The Kenyon Bros. adjustment results in existing, and possible future,⁷ infrastructure completely surrounding property to the northeast. Further, it impacts homes along Lukens Road to a greater degree than ComEd's Proposed Primary Route. Despite these newly affected landowners, nothing on the record indicates that the Kenyon Bros., or ComEd, engaged in any additional "robust public process," such as an open house or even discussions with neighboring landowners. Murphy, Tr., 442:10-12. Undeterred by its own stated position on public exposure and feedback, ComEd supports the Kenyon Bros. proposed adjustment.

⁷ The land shown to be owned by ComEd in the ComEd generated Kenyon Bros. map appears to be the location of what witness Kaup referred to as ComEd's future Charter Grove Substation. Kaup, Dir., ComEd Exh. 6.0, Il.104.

ComEd's own behavior in this Docket belies its position regarding the public process. Rather, its actions show that once a Petition is filed in a § 8-406.1 expedited docket, even a utility – with a large budget and great deal of experience with such a process – is unable or at least unwilling to perform the task. The Kenyon Bros. example, along with ComEd's failure to propose a public forum, suggest that the outreach doesn't matter as much as ComEd asserts.

3. *Dauphinais used the same process and data that ComEd did, including data from the ComEd's public outreach.*

One reason that additional public outreach may not be as important as ComEd asserted might be that ComEd chose to simply rely upon the information it had already collected. If that is the case, then ComEd's attacks on proposed adjustments simply ignore the undisputed facts, to wit, Mr. Dauphinais had access to ComEd's own data – including that touching on public input and used the same methodology as ComEd. *Compare*, Dauphinais, Tr., 224:1-5; Murphy, Tr., 279:2-3; *see also*, Rashid, Tr., 177:1-10 (stating that Mr. Dauphinais' methodology was reasonable).

No party in these proceedings has suggested that other parties' reliance on the data gathered from ComEd's public engagement is wrong. No party has suggested that the voluminous amounts of information contained within the Petition was lacking. *See*, ComEd Exh. 5.03, generally. Further, no party has suggested that Mr. Dauphinais ignored the public input information. Thus, Mr. Dauphinais was justified in his reliance upon the data gathered from ComEd's public engagement in generating his proposed adjustments and investigating and testifying as to routing alternatives proposed by others.

4. *After reopening, Dauphinais' reliance on public input through intervention is even more reliable*

As he testified, beyond the public input from ComEd's public process, Mr. Dauphinais' routing review and development process considers feedback from intervenors. This Commission has accepted this practice in the past. Dauphinais, Tr., 217:10-13, 250:19-251:3 (citing to Ill.

Commerce Comm'n Docket 06-0179). Now, due to reopening, even more landowners have been notified and have, or could have, intervened and submitted their thoughts and concerns. Thus, Mr. Dauphinais' approach has only been bolstered through reopening.

As part of the process of fixing its error,⁸ ComEd informed the Commission and parties that anyone on, or adjacent to, any proposed routing put forth by ComEd or an intervenor, has been notified. Motion to Amend Petition, ¶ 5, at 2 (May 29, 2014), *see also*, Murphy, Tr., 440:12-22. Ms. Murphy admits that those notifications had their intended effect, and some individuals chose to participate in these proceedings. Murphy, Tr., 441:9-12. Accordingly, the very process that Mr. Dauphinais utilized to solicit public feedback has been buttressed. Those landowners who chose to submit evidence to the Commission are discussed below.

B. Superiority of Individual Routes

ComEd has failed, initially or on reopening, to proffer any evidence that any of the SKP Group's supported adjustments: are unable to be constructed, are more difficult to operate, are more costly to operate, impact the environment to a greater degree than ComEd's Proposed Primary Route, impact historical resources to a greater degree than ComEd's Proposed Primary Route, or are based upon faulty quantitative analysis or values. Dauphinais, Dir., SKP Exh. 2.0, ll. 22-53; Kaup, Tr., 108:15-20 (noting no foreseeable issues with constructing the Kenyon-Deutsch proposed alternative). In fact, as noted above, the only aspect Ms. Murphy could recall concerning the claimed superiority of ComEd's Primary Route was ComEd's public engagement. That purported advantage being addressed above, it is manifest that SKP Group supported adjustments – the Kenyon-Deutsch combined alternative, Dauphinais Adjustment 1, and Dauphinais Adjustment 2 – constitute superior routing segments. Because the record was reopened, and various

⁸ Utilizing landowner data gathered outside the bounds of the applicable rules and statutes. *Supra*.

individuals filed Petitions to Intervene and/or submitted evidence, brief additional discussion of routing alternatives is provided.

1. *The Kenyon-Deutsch proposed alternative route is the most superior routing in the Kane-DeKalb county line area*

Even after reopening, no party in these proceedings has disagreed with the fact that the Kenyon-Deutsch combined alternative, when compared to the segment of the Proposed Primary route it replaces, is shorter, cheaper, places four fewer residences within 500 feet of the proposed routing centerline, places nineteen fewer non-residential structures within 500 feet of the proposed routing centerline, and utilizes more existing railroad corridor. See, Dauphinais, Cross-Reb., SKP Exh. 3.8; see also, Murphy, Tr., 426:10-20. This route is not only categorically superior, but is also not opposed by any intervenor in these proceedings. Murphy, Tr., 426:22-427:3. Indeed, even new intervenors upon reopening support this routing alternative. Schramm, Dir., Exh. 1.00, ll. 46-47. Landowner William Lenschow, who testified on reopening, also continues to support this alternative. Lenschow Reb. on Reopening, Lenschow Exh. 3.0, ll. 10-13.

ComEd's sole disclosed concern regarding the utilization of the Kenyon-Deutsch combined alternative route is the need to obtain right of way on land owned by a forest preserve. The Kane County Forest Preserve District ("KCFPD") indicated it is open to granting easements on forest preserve land. See, Meyers, Reb., Exh. 1.0 (v.2), *generally*. Such an arrangement would objectively seem available and reasonable, as the property is currently utilized for farming, not as a preserve, and would not be objected to by the tenant farmer. Lenschow, Cross-Reb., Exh. 2.0, ll. 29-32.

ComEd's routing witness didn't participate in any negotiations with the KCFPD. Murphy, Tr., 435:8-21. Further, as part of a purported "serious and determined attempt" to discuss the use of the Burlington Prairie Preserve land, ComEd didn't even bother to come to the table knowing

what was actually needed from the KCFPD. Naumann, Tr., 454:1-18. Despite contending that the KCFPD said “no” twice, ComEd’s witness was unable to recall whether or not ComEd even sought such property rights from the KCFPD. Naumann, Tr., 455:3-7. As such, it is apparent that no serious effort was made at surmounting this purported obstacle.

Railroad property to be used for paralleling a transmission line cannot be condemned, yet, ComEd goes out of its way to utilize it. *In re City of Creede, Co – Petition for Declaratory Order*, Opinion, STB Finance Docket 34376, 2005 STB LEXIS 486, *12-13 (Surface Transp. Bd. May 3, 2005). Additionally, this Commission has ordered routing that included forest preserve property. *Lazazzera v. Commonwealth Edison Co.*, Order, p. 24, Docket 90-0265 (May 28, 1992) (stating that unwillingness to provide an easement on a proposed route doesn’t preclude consideration of the route). Considering ComEd’s apparent, at best, half-hearted attempts to obtain an easement within the Burlington Prairie Forest Preserve⁹ that is currently being utilized for farming, it is eminently reasonable to consider the Kenyon-Deutsch combined alternative.

Due to the fact that the Kenyon-Deutsch combined alternative is undoubtedly superior, not objected to by any party in these proceedings, and ComEd appears to have not truly attempted to obtain an easement to utilize this superior route, the Commission, if it decides to approve the GPG Project, should order that it be constructed along the Kenyon-Deutsch combined alternative. If, and only if, ComEd returns to this Commission, with evidence of the failure of serious and determined attempts at good-faith negotiations, should the Commission consider amending its order authorizing a different route. If that were to occur, the next best route would be Dauphinais Adjustment 1.

⁹ Which, according to the record, the Forest Preserve District of Kane County is considering. Lenschow, Cross-Reb., Exh. 2.0, II. 42-45.

2. *Dauphinais Adjustment 1 should be utilized if the Kenyon-Deutsch combination is not*

Again, even after reopening, no party in these proceedings has disagreed with the fact that Dauphinais Adjustment 1, when compared to the segment of the Proposed Primary route it replaces, is shorter, only marginally more costly (\$70,000, or 0.7%), places four fewer residences within 500 feet of the proposed routing centerline, places twenty fewer non-residential structures within 500 feet of the proposed routing centerline, and parallels apparent property and field lines. See, Dauphinais, Reb., SKP Exh. 2.1.

The Deutsch's disagreement with Dauphinais Adjustment 1 was thoroughly rebuked as relying on speculation and comparing apples to oranges. SKP Group & URM Co Reply Brief, pp. 23-33. Similarly, any opposition, stated or unstated, to this categorically superior route by intervenors Smith or Schramm is without merit.

Smith's testimony, being revised after portions of the same were struck by the ALJ's Ruling of July 28, 2014, only contains a location of Ms. Smith's property and that she would be impacted by the Primary Route and an unnamed Alternate Route. Smith, Dir., Exh. 1.00 REV. Considering the fact she received notice near the onset of these proceedings, it would appear that the alternate mentioned was ComEd's Proposed Alternate Route. *Id.*, ll. 24-25. Accordingly, Smith has provided no evidence that Dauphinais Adjustment 1 or the Kenyon-Deutsch combined alternative is anything but superior to ComEd's proposed routing.

Mr. Schramm supports ComEd's Proposed Primary Route, solely by virtue of "Not In My Back Yard" arguments. Schramm, Dir., Exh. 1.00, ll. 54-56. While, Mr. Schramm doesn't care for Dauphinais Adjustment 1, his residence is at least 1,000 feet away from its centerline. *Id.*, ll. 39-41. This is well outside the *de facto* 500 foot standard for analysis of impacts on residences. Dauphinais, Tr., 223:1-11; Murphy, Tr., 278:12-279:9; see also, Rashid, Tr., 177:5-10 (approving of

routing methodologies). Mr. Schramm is not even aware of whether or not Dauphinais Adjustment 1 would impact the land's use. Schramm Dir. on Reopening, Exh. 1.00, ll. 34-36 (stating the "transmission line *may* interfere"). Such mere speculation cannot serve to oppose a categorically superior route, especially when the witness asserts that he wouldn't even "want to share the right-of-way." *Id.* ll. 31-32. Even if the line were not on his property, Mr. Schramm would still oppose it. *Id.*, ll. 61-62 (stating, after admitting that he doesn't know whether or not ComEd's Proposed Alternate Route is on his property, he would still oppose it). It is apparent that Mr. Schramm is merely concerned about "aesthetics of the area." *Id.*, ll. 32-34. However, Mr. Schramm doesn't explain why a neighboring property isn't part of "the area." Apparently, "the area" consists of the back portion of his property, but does not include the general area, which encompasses ComEd's proposed Primary Route.

In his testimony on reopening, Mr. Lenschow explains, again, why ComEd's Primary Route is unworkable and unacceptable in the area of his property, and that Dauphinais Adjustment 1 is a superior alternative. If routed along the Primary Route, the line would run along the front of and in close proximity to Mr. Lenschow's home and other buildings comprising his dairy operation. Lenschow Reb. On Reopening, Lenschow Exh. 3.0.

In the end, Mr. Schramm provides no convincing or legally recognized reason opposing Dauphinais Adjustment 1. He neither refutes any of the numerous benefits of the proposed routing adjustment, nor provides any relevant quantitative data, nor cites any precedent in support of his position. Instead, he relies upon his subjective feeling that he simply does not want it at the rear of his land, far away from his residence.

As demonstrated, nothing in the record, even after more evidence was compiled on reopening, refutes that Dauphinais Adjustment 1 is superior to any route alternative (other than the preferred Kenyon-Deutsch combined alternative). Accordingly, Dauphinais Adjustment 1 remains

the superior route in the area if the Commission does not accept the Kenyon-Deutsch combined alternative.

3. *Dauphinais Adjustment 2 remains the superior routing alternative south of Burlington*

Just as with Dauphinais Adjustment 1, even after interventions and submission of evidence on reopening, Dauphinais Adjustment 2, when compared to the segment of the Proposed Primary route it replaces, remains the superior route for the area south of the Village of Burlington. It is shorter, substantially cheaper (\$1.27 million, or 16.4%), and places fewer homes within 500 feet of the centerline. Dauphinais, Reb., Exh. 2.2; Pienkowski Reb. on Reopening, Pienkowski Exh. 4.0, ll. 58-63. While several individuals intervened upon reopening, only one, Timothy Polz, submitted any evidence into the record.¹⁰ As Thomas Pienkowski testified on reopening, nothing Mr. Polz has submitted changes the fact that Dauphinais Adjustment 2 is superior. *Id.*, ll. 24-36

Mr. Polz has only submitted testimony that his home is adjacent to Dauphinais Adjustment 2. Polz, Dir., ll. 23. Mr. Polz's home was stipulated to be 600 feet away from Dauphinais Adjustment 2. Stipulation (July 22, 2014). This is outside the 500 foot *de facto* standard for tabulating impacts to residences.

Thus, while Mr. Polz provided some quantitative evidence, in the form of the stipulation, it does nothing to alter Mr. Dauphinais' routing study and conclusions. Accordingly, Dauphinais Adjustment 2 remains the superior route in the area south of the Village of Burlington and this Commission should order that the GPG Project, if approved, be constructed utilizing this routing adjustment.

¹⁰ Despite having intervened, and submitting testimony, Mr. Riley Skaggs and Ms. Rachel Lange never moved their testimony into evidence. Further, Mr. Skaggs failed to appear for cross-examination.

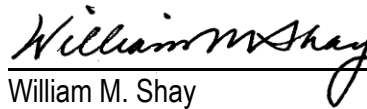
III. Conclusion

The need for or appropriateness of the GPG Project, or whether it qualifies for approval, were not subjects of this proceeding on reopening. Consequently, this Initial Brief on Reopening does not address the approval issue. The absence of argument on that issue, however, should not be construed as a waiver of opposition to the GPG Project, or concurrence that it should be approved.

For all the reasons set forth in this Initial Brief on Reopening, as well as in the Initial Brief and Reply Brief, the SKP Parties and URM request that, in the event the GPG Project is approved, the Commission order that it be routed using (i) either the Kenyon-Deutsch combined alternative route, or Dauphinais Adjustment 1; and (ii) Dauphinais Adjustment 2. While not a focus of the proceeding on reopening, the SKP Parties and URM also request that any order approving the GPG Project include a requirement of underground burial of the transmission line for the Eastern Portion of the GPG Project.

Respectfully submitted,

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